FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 10 1995

Pamela J. Archer, Treasurer
Huntington Bancshares, Incorporated
Political Action Committee (HBI-PAC)
41 South High Street
Columbus, OH 43215

Identification Number: C00165589

Reference: Year End Report (11/29/94-12/31/94)

Dear Ms. Archer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your calculations for Lines 30 and 31, Column B appear to be incorrect. FEC calculations disclose this amount to be $71,490.47. Please provide the corrected total on the Detailed Summary Page.

-Schedule B of your report discloses a $350 payment to your connected organization for reimbursements for in-kind contributions made to a Federal candidate (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this

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letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Donald L. Averett
Senior Reports Analyst
Reports Analysis Division

224

SCHEDULE B

ITEMIZED DISBURSEMENTS
(Transfers to Candidates)

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Huntington Bancshares Incorporated Political Action Committee (HBI-PAC)

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. The Huntington National Bank 41 South High Street Columbus, Ohio 43215	Reimbursement for Deborah Pryce Luncheon	12-28-94	70.00
B. The Huntington National Bank 41 South High Street Columbus, Ohio 43215	Reimbursement for Deborah Pryce Reception	12-28-94	280.00
C.			
D.			
E.			
F.			
G.			
H.			
I.			

SUBTOTAL of Disbursements This Page (optional) 350.00

TOTAL This Period (last page this line number only) 350.00